

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

HOWARD HALEY,)	
)	
Plaintiff,)	
)	
v.)	
)	CIVIL ACTION NO. CV210-122
HARLEY LAPPIN; ANTHONY HAYNES;)	
ROBERT COUSSON; DEBORAH)	
FORSYTH; BUREAU OF PRISONS; and)	
FEDERAL PRISON INDUSTRIES,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS
AMENDED COMPLAINT

COME NOW the above-named defendants¹ and file this Defendant's Motion to Dismiss Amended Complaint pursuant to Rule 12(b), Fed. R. Civ. P.,² as set forth more fully in their Brief in Support submitted herewith.

This 5th day of May, 2011.

Respectfully submitted,

EDWARD J. TARVER
UNITED STATES ATTORNEY

/s/ Melissa S. Mundell
Assistant United States Attorney
Georgia Bar No. 529475
Post Office Box 8970
Savannah, Georgia 31412
(912) 652-4422

¹ It is assumed that the intended defendants are those named in the amended complaint.

² In filing this motion to dismiss, Defendants do not waive but rather expressly preserve the defenses of business necessity, undue hardship, and good faith.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing Defendants' Motion to Dismiss Amended Complaint, along with its attachments, upon all parties in this case in accordance with the Notice of Electronic Filing ("NEF") which was generated as a result of electronic filing in this Court.

This 5th day of May, 2010.

Respectfully submitted,

EDWARD J. TARVER
UNITED STATES ATTORNEY

/s/ Melissa S. Mundell

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